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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA (LAS VEGAS)	
PAUL LEWIS BROWNING, Plaintiff, v. LAS VEGAS METROPOLITAN POLICE DEPARTMENT <i>et al.</i> , Defendants.	Case No. 2:20-CV-01381-KJD-VCF Hon. Kent J. Dawson Hon. Cam Ferenbach STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT (First Request)

Pursuant to Local Rule IA 6-1, the parties, by and through their counsel of record, hereby agree and stipulate that the time for Bettie Browning, Administrator of the Estate of Paul Browning, to file her reply in support of Plaintiff's Motion for Leave to Amend Complaint (ECF No. 64), which was filed on March 1, 2023, should

1 be extended by one week—from April 7, until and including April 14, 2023. The
2 following grounds constitute good cause:

3 1. On March 1, 2023, Plaintiff filed a Motion for Leave to File an
4 Amended Complaint (ECF No. 64). Pursuant to Local Rule 7-2(b), Defendants’
5 response was due on March 15, 2023.

6 2. On March 6, 2023, Defendants filed a stipulation extending the
7 deadline to file their response from March 15, 2023 to March 31, 2023 (ECF No. 65).

8 3. While Plaintiff’s counsel have endeavored to file their reply by the
9 current deadline of April 7, 2023, they are occupied with other time-sensitive
10 matters, including an appellate brief in *Lobato v. LVMPD* - due on April 5, 2023 -
11 along with an appellate brief in *Apolo-Albino v. State of Washington* and a reply
12 brief in *Simmers v. King County*, both due on April 6, 2023.

13 4. This stipulation is not brought for any improper purpose, but rather to
14 ensure that both sides to this matter are permitted the benefit of appropriate
15 review of relevant evidence and the time to clearly and adequately lay out the
16 issues for the Court’s resolution.

17 5. Plaintiff’s counsel have conferred with counsel for Defendants, and the
18 parties have agreed to this extension. Accordingly, Plaintiff and Defendants
19 stipulate that Plaintiff’s deadline to file the reply in support of the Motion for Leave
20 to Amend Complaint should be extended until April 14, 2023. This stipulation is
21 made in good faith and not for the purpose of delay.

22
23 Respectfully submitted,

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25 /s/ David B. Owens

26 One of Plaintiff’s Attorneys

27 /s/ Craig Anderson

28 One of Defendants’ Attorneys

ORDER

IT IS SO ORDERED that the above Stipulation is hereby GRANTED.
Plaintiff shall have until April 14, 2023, to file a reply in support of the Motion for
Leave to Amend Complaint.

DATED this 4th day of April 2023.



UNITED STATES ~~DISTRICT~~ JUDGE
Magistrate

Certificate of Service

I, David B. Owens, an attorney, certify the foregoing was filed on April 4, 2023, via the Court's electronic filing system, which effected service on all counsel of record.

/s/ David B. Owens